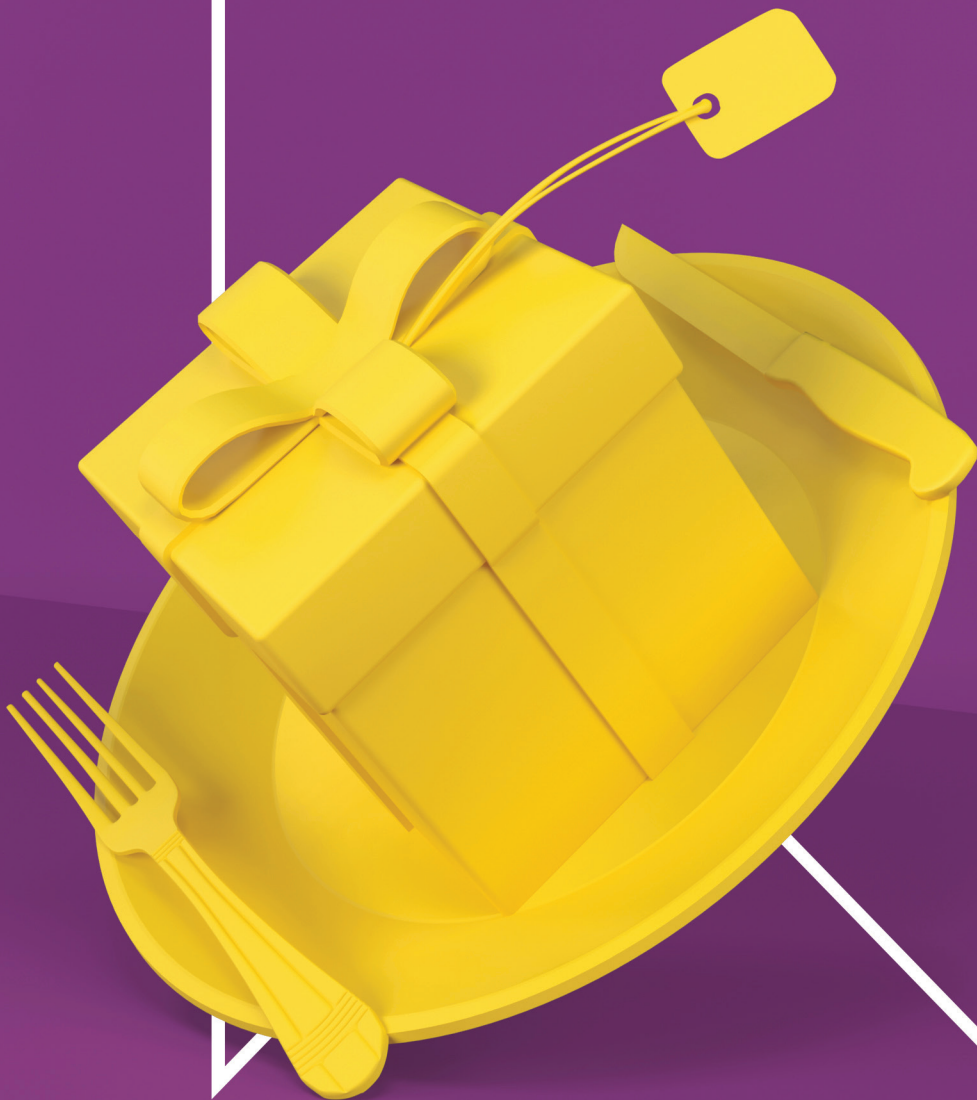


POLICY ON GIFTS, ENTERTAINMENT AND HOSPITALITY



We offer and accept gifts, business meals, entertainment and hospitality in an appropriate and transparent manner, only occasionally and never to unduly influence business decisions

WHY THIS POLICY?

We work with our customers, suppliers and other business partners to grow together. This also involves creating goodwill, fostering long-lasting business relationships and showing appreciation. In addition, hosting and participating in events that contribute to the enjoyment of life are central to our business. However the offering or receiving of gifts, entertainment and hospitality, including entertainment and hospitality at our Company's sponsored events, should never influence, or appear to influence, the integrity of business decisions or the loyalty of the persons involved. In other words: it may never be meant or be perceived as a bribe.

This Policy explains what our do's and don'ts are when providing gifts, business meals, entertainment and hospitality to others, as well as when receiving these. It is intended to clarify matters and to avoid accusations of improper conduct, reputations being damaged or even laws being violated.

Be aware that stricter rules and procedures may apply in your Company or country. If so, you must adhere to those rules and abide by such procedures.

WHAT ARE GIFTS, BUSINESS MEALS, ENTERTAINMENT AND HOSPITALITY, AND SPONSORED EVENTS?

Gifts

A gift is any good or item of value given without payment or other consideration in return. It includes presents such as personal discounts, tickets or other presents. Promotional branded materials or free samples offered to vendors or bar owners and the like are not considered gifts in light of this Policy, if they are offered in reasonable quantities and frequency.

Business meals

A business meal is a meal provided for example to customers, suppliers and other business partners (including government officials or other politically exposed persons) or offered to you with the primary purpose of building, promoting or enhancing the business relationship. If the host is not present, such a meal is considered a gift.

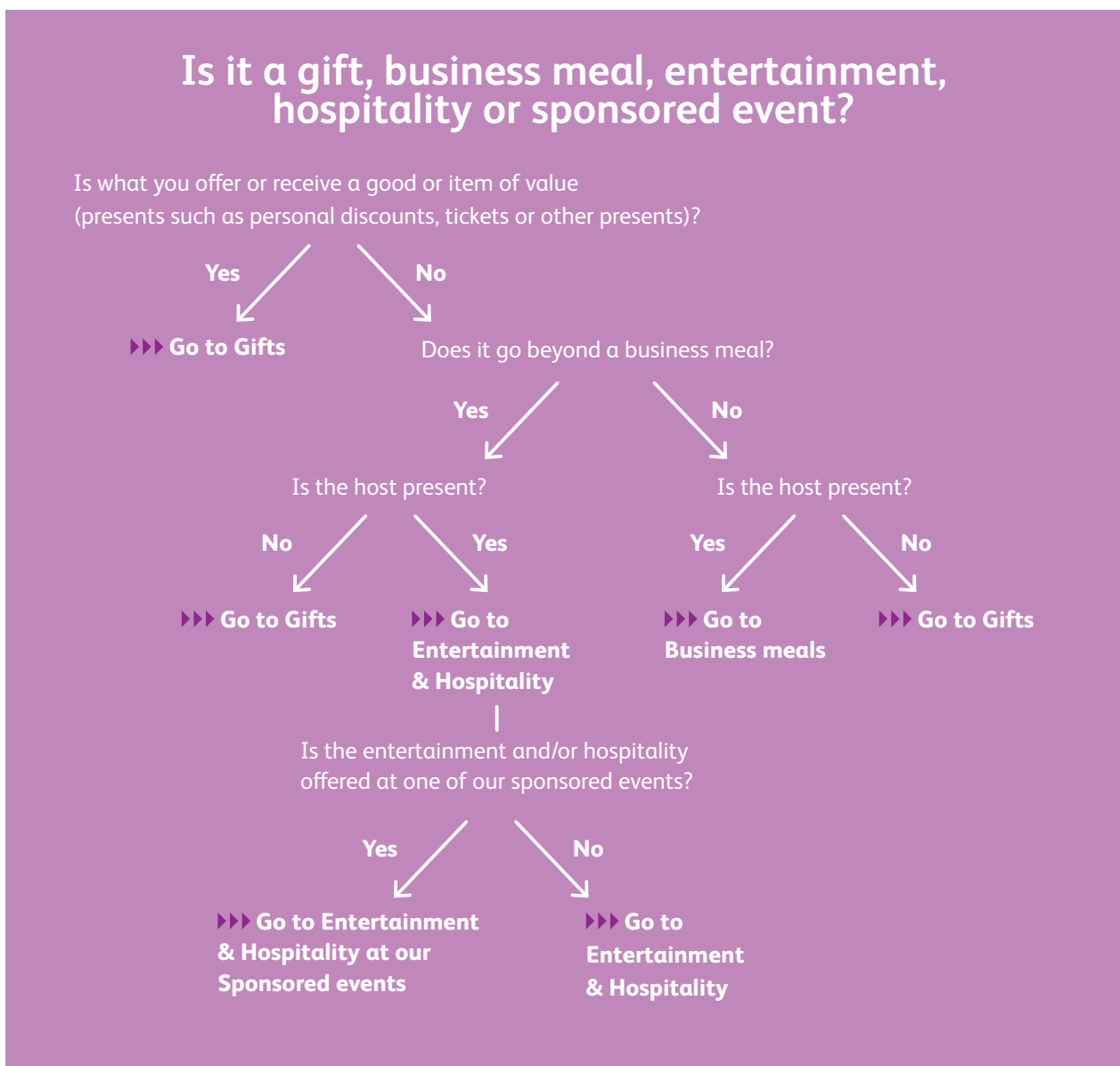


Entertainment and hospitality

In this Policy entertainment and hospitality refer to an event lasting up to a full day that goes beyond a mere business meal and includes something entertaining, such as a theatre performance, concert or sports event. In view of our business, customary market visits do not qualify as entertainment. Entertainment and hospitality in this Policy can also mean events which include cross-border travel and/or overnight accommodation. If you offer or receive entertainment or hospitality and the host is not present, this is considered a gift. If you wish to offer entertainment or hospitality at one of our sponsored events, the do's and don'ts on sponsored events apply.

Sponsored events

With sponsored events we refer to events, such as concerts, festivals, film and sports events that are sponsored by our Company, lasting up to a full day or more. This may include cross-border travel and/or overnight accommodation. If you offer entertainment and hospitality at one of our Company's sponsored events and the host is not present, this is considered a gift.



GIFTS

Do's

- You may occasionally offer or accept a gift if all of the following conditions are met:
 - ✓ It is a reasonable complement to the business relation;
 - ✓ It cannot be perceived as a bribe;
 - ✓ It is proportionate to the recipient's position;
 - ✓ It is in line with the applicable gift policies, generally accepted business practices of the respective country, our Code and the applicable law of that country;
 - ✓ It demonstrates good taste and is mindful of your and HEINEKEN's reputation;
 - ✓ It is done in a transparent way;
 - ✓ The value is below €100 or similar appropriate amount and communicated in your Company; and
 - ✓ Any expenses are accurately recorded, also indicating the recipient(s).
- For gifts offered with a value higher than €100, in addition to the conditions above, you must also have written approval from your manager and accurately register it in the applicable gift, entertainment and hospitality registry in your Company.
- For gifts accepted with a value higher than €100 you must notify your manager and accurately register it in the applicable gift, entertainment and hospitality registry in your Company.
- For gifts that we give to other companies or that other companies give to us as a company, the basic principles above apply, but no amount is set. Such inter-company gifts can only be provided by or accepted with the prior written approval from the Managing Director/General Manager (or similar level/position manager). Any gifts accepted by our Company are company owned and must remain our Company's property.

Exceptions?

- Offering free beer in reasonable quantities and frequency is acceptable.
- Occasionally offering promotional branded items in reasonable quantities and frequency to vendors, bar owners and the like is acceptable.
- Providing trophies with an inscription etc. at public ceremonies is acceptable.
- Discounts available to large groups of employees are acceptable.

Don'ts

- Do not offer gifts to government officials or other politically exposed persons. In circumstances or situations where gift giving is part of the cultural norm, e.g. religious holidays or festivals, and where failing to provide a gift would be culturally insensitive, consult your Legal and Corporate Affairs Department to seek for an appropriate alternative. In any case offering gifts to government officials or other politically exposed persons is only allowed if it is fully in line with all applicable anti-bribery laws and with the prior written approvals from (i) the Legal Department and the (ii) the Managing Director/General Manager (or similar level manager). ▶▶▶ You can find more guidance in the HEINEKEN Policy on Bribery
- Do not request or solicit gifts, either for your own benefit or for those close to you.
- Do not offer or accept cash and cash equivalents, such as vouchers.
- Do not offer or accept gifts to or from (a representative of) a business partner if our Company is in

negotiations, a tender process, or if there is a legal dispute with that business partner.

- Do not let accepting a gift influence your objectivity or loyalty to our Company in making the right business decisions and when offering gifts, avoid undue pressure on the recipient.
- Do not accept a gift from or offer a gift to a competitor.

Q: I would like to buy a gift for a supplier above the threshold. There is no time for official approval. Is it ok if I buy the gift with my own money and then claim it back on expenses?

A: Even if you choose to buy the gift at your own expense, you are still offering the gift as a representative of HEINEKEN. This means that this Policy also applies and that this is not allowed without prior approval.

Q: I have been invited to the wedding of the daughter of a local government official. In my culture it is expected that the guests give cash gifts at the wedding. Given the circumstances, is a cash gift here acceptable?

A: HEINEKEN understands cultural differences to which we have to be sensitive. However, providing cash gifts is not allowed, as it exposes our Company to unacceptable risks. You should discuss the matter with the Legal and Corporate Affairs Department to see if an alternative solution can be found, such as offering a non-cash gift.

BUSINESS MEALS

Do's

- In doing business, it may be customary to occasionally offer and accept business meals. You may offer or accept a business meal if all the following conditions are met:
 - ✓ It is a reasonable complement to the business relationship;
 - ✓ It cannot be perceived as a bribe;
 - ✓ It is proportionate to the recipient's position;
 - ✓ It is in line with the applicable policies, generally accepted business practices of the respective country, our Code and the applicable law in your country;
 - ✓ It is done in a transparent way; and
 - ✓ The expenses are accurately recorded, also indicating the persons present.
- Business meals offered should always be approved, signed and paid for by the highest ranking employee present.
- Offering business meals to government officials and other politically exposed persons requires careful attention. This is only allowed if it complies with the above conditions, it is fully in line with all applicable anti-bribery laws and with the prior written approvals from (i) the Legal Department and (ii) the Managing

Director/General Manager (or similar level manager). ▶▶▶ [You can find more guidance in the HEINEKEN Policy on Bribery](#)

- The maximum amount for the meal (including drinks) must be reasonable in the relevant circumstances and the country that you are in.

Don'ts

- Do not request or solicit gifts, either for your own benefit or for those close to you.
- Do not offer or accept business meals to or from (a representative of) a business partner of our Company during a tender process.
- Do not let accepting a business meal influence your objectivity or loyalty to our Company in making the right business decisions and when offering business meals avoid undue pressure on the recipient.

ENTERTAINMENT AND HOSPITALITY

Do's

- You may occasionally offer or accept entertainment and hospitality if all the following conditions are met:
 - ✓ It is a reasonable complement to the business relation;
 - ✓ It cannot be perceived as a bribe;
 - ✓ It is proportionate to the recipient's position;
 - ✓ It is in line with the applicable policies, generally accepted business practices of the respective country, our Code and the applicable law in that country;
 - ✓ It demonstrates good taste and is mindful of your and HEINEKEN's reputation;
 - ✓ It is done in a transparent way;
 - ✓ The value remains below € 250 per person or similar amount appropriate and communicated in your country; and
 - ✓ Any expenses are accurately recorded, also indicating the persons present.
- Entertainment and hospitality offered or accepted that is worth more than € 250 per person in value requires prior written approval from your manager with notification to the Legal Department. In addition, it must be accurately registered in the applicable gift, entertainment and hospitality registry in your Company.
- Entertainment and hospitality offered should always be approved, signed and paid for by the highest-ranking employee present.
- Offering entertainment or hospitality to government officials and other politically exposed persons requires careful attention. Only do so if it meets the above conditions, it is fully in line with all applicable anti-bribery laws and when you have the prior written approvals from (i) the Legal Department and (ii) the Managing Director/General Manager (or similar level manager). ▶▶▶ [You can find more guidance in the HEINEKEN Policy on Bribery](#)
- In principle, entertainment and hospitality are not meant for partners and other family members of our business relationships.
- If you offer or accept any entertainment and hospitality more than once to or from the same person, within a 12-month period, this requires approval from your manager and the Legal Department.
- Accept invitations for entertainment and hospitality from a competitor only after consulting the Legal Department and prior written approval from the Managing Director/General Manager (or similar level manager).
- Inviting people under the legal drinking age is not allowed.

Don'ts

- Do not request or solicit personal invitations for entertainment and hospitality, either for your own benefit or for those close to you.
- Do not offer or accept entertainment or hospitality from (a representative of) a business partner if our Company is in negotiations, a tender process, or if a dispute exists with that business partner.
- Do not let accepting entertainment or hospitality influence your objectivity or loyalty to our Company in making the optimal business decisions and when offering avoid undue pressure on the recipient.

Q: One of our customers is offering me two tickets to a concert he cannot attend. I think the tickets are around EUR 200 each. Can I take them?

A: No, you should not accept them. First of all, if the customer himself or herself is not present, this is regarded as a gift. Therefore, you should follow the guidelines for accepting gifts. Tickets to a concert the customer does not sponsor are not considered a reasonable complement to the business relationship. In addition, the value guidelines should be taken into account.

Conflicts of interest

Accepting business meals, entertainment or hospitality must never influence your objectivity or loyalty to our Company when making the right business decisions. If, by accepting such an invitation, you would feel obligated to somehow return the favor (e.g. by giving better conditions): do not accept it.

Pay extra attention if you are offered anything from an individual or company that is seeking to do business with our Company. ▶▶▶ You can find more guidance in the HEINEKEN Policy on conflicts of interest

ENTERTAINMENT AND HOSPITALITY AT OUR SPONSORED EVENTS

Do's

- You may occasionally offer entertainment and hospitality to business relations at our Company's sponsored events if all the following conditions are met:
 - ✓ It is a reasonable complement to the business relationship;
 - ✓ It cannot be perceived as a bribe;
 - ✓ It is proportionate to the recipient's position;
 - ✓ It is in line with the applicable policies, generally accepted business practices of the respective country, our Code and the applicable law in your country;
 - ✓ It demonstrates good taste and is mindful of your and HEINEKEN's reputation;
 - ✓ It is done in a transparent way;
 - ✓ The value remains below € 250 per person or similar amount appropriate and communicated in your



country; and

- ✓ The business associate visiting our event is accurately registered before the event, in or via the available registration system for such events in your Company. Registration always includes the name of the business relationship visiting the event and the name of the host.

- Entertainment and hospitality offered at sponsored events that is worth more than € 250 per person in value requires prior written approval from your manager with notification to the Legal Department.
- Offering entertainment and hospitality at our sponsored events to government officials and other politically exposed persons requires careful attention. Only do so if it meets the above conditions, it is fully in line with all applicable anti-bribery laws and when you have the prior written approvals from (i) the Legal Department and (ii) the Managing Director/General Manager (or similar level manager).
▶▶▶ You can find more guidance in the [HEINEKEN Policy on Bribery](#)
- In principle, entertainment and hospitality at our sponsored events are not meant for partners and other family members of our business relationships.
- If you offer any entertainment or hospitality more than once to or from the same person or company within a 12-month period, this requires approval from your manager and the Legal function.

Don'ts

- Do not offer entertainment and hospitality to (a representative of) a business partner if our Company is in negotiations, a tender process, or if a dispute exists with that business partner.
- Do not invite people under the legal drinking age to our sponsored events.
- Avoid undue pressure on the recipient when offering entertainment or hospitality at our sponsored events.

Q: I would like to invite a business associate to a sports event that is being sponsored by our Company, but I know that the value of the ticket is higher than the € 250 threshold. Are there circumstances where approval would be given?

A: You should discuss your wish to invite this business associate with your manager, who decides whether this is a reasonable complement to the business relationship and is proportionate to the recipient's position. If it meets these and all other conditions stated in this Policy, approval may be given.

SPEAK UP

If you have any concern regarding a possible violation of this Policy, speak up! Raise any concern you have through your manager, Trusted Representative, Global Business Conduct or through our Speak Up service: online (<http://speakup.heineken.com>) or by phone through the Integrity Line in your country. You can do this either anonymously or not. Whatever feels comfortable to you.



▶▶▶ You can find more guidance in the HEINEKEN Speak Up Policy

QUESTIONS?

If you are in doubt, be transparent and discuss any questions you may have with your colleagues or consult your manager or Legal Department.

For further guidance and support you can contact Global Business Conduct at businessconduct@heineken.com.

- Note that not acting in accordance with this policy may lead to disciplinary measures, including termination of employment. ▶▶▶ You can find more guidance in the HEINEKEN Policy on disciplinary measures
- This policy applies to all individuals as described in the HEINEKEN Code of Business Conduct.

ANNEX 1: OVERVIEW GIFTS, BUSINESS MEALS, ENTERTAINMENT AND HOSPITALITY, AND SPONSORED EVENTS

GIFTS

To/from whom?	Approval?		Ask yourself	Do not forget!
Offering to business associates	Below EUR 100:	No	Is it transparent, proportionate, demonstrates good taste and cannot be perceived as a bribe?	To accurately record any expenses
	Above EUR 100:	Manager		To accurately register in the gift, entertainment and hospitality register
Accepting from business associates	Below EUR 100:	No	Is it transparent, proportionate, demonstrates good taste and cannot be perceived as a bribe?	To accurately record any expenses
	Above EUR 100:	Notification Manager		To accurately register in the gift, entertainment and hospitality registry
Offering to government officials and other politically exposed persons	Always:	Legal Department and the Managing Director/ General Manager	Is it transparent, proportionate, demonstrates good taste and cannot be perceived as a bribe?	To accurately register in the gift, entertainment and hospitality registry

BUSINESS MEALS

To/from whom?	Approval?		Ask yourself	Do not forget!
Offering to or accepting from business relations	Always:	Highest ranking employee present	Is it transparent, proportionate and cannot be perceived as a bribe?	To accurately record any expenses
Offering to government officials and other politically exposed persons	Always:	Legal Department + Managing Director/ General Manager	Is it transparent, proportionate and cannot be perceived as a bribe?	To accurately register in the gift, entertainment and hospitality registry

ENTERTAINMENT AND HOSPITALITY

To/from whom?	Approval?		Ask yourself	Do not forget!
Offering to or accepting from business associates	Below EUR 250:	Highest ranking employee present	Is it transparent, proportionate, demonstrates good taste and cannot be perceived as a bribe?	To accurately record any expenses
	Above EUR 250:	Manager + notification Legal function		To accurately register in the gift, entertainment and hospitality register
	More than once within 12-month period to same business partner:	Manager + Legal Department		To accurately register in the gift, entertainment and hospitality register
Offering to government officials and other politically exposed persons	Always:	Legal Department + Managing Director/ General Manager	Is it transparent, proportionate, demonstrates good taste and cannot be perceived as a bribe?	To accurately register in the gift, entertainment and hospitality registry

ENTERTAINMENT AND HOSPITALITY AT OUR SPONSORED EVENTS

To whom?	Approval?		Ask yourself	Do not forget!
Offering to business relations	Below EUR 250:	Highest ranking employee present	Is it transparent, proportionate, demonstrates good taste and cannot be perceived as a bribe?	To accurately register before the event, including the name of business partner present and the host
	Above EUR 250:	Manager + notification Legal Department		
	More than once within 12-month period to same business partner:	Manager + Legal Department		
Offering to government officials and other politically exposed persons	Always:	Legal Department + Managing Director/ General Manager	Is it transparent, proportionate, demonstrates good taste and cannot be perceived as a bribe?	To accurately register before the event, including the name of person present and the host